

United States Bankruptcy Court  
Eastern District of North Carolina

In re:  
CAH Acquisition Company 1, LLC d/b/a Was  
Debtor

Case No. 19-00730-JNC  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0417-5  
Date Rcvd: May 17, 2023

User: admin  
Form ID: pdf014

Page 1 of 8  
Total Noticed: 0

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 19, 2023:**

NONE

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
tr	##+	Thomas W. Waldrep, Jr., Waldrep Wall Babcock & Bailey PLLC, 1076 West Fourth Street, Winston-Salem, NC 27101-2440

TOTAL: 0 Undeliverable, 0 Duplicate, 1 Out of date forwarding address

## NOTICE CERTIFICATION

**I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 19, 2023

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 17, 2023 at the address(es) listed below:

Name	Email Address
Allison Jean Becker	on behalf of Defendant Rampey Enterprises Inc. abecker@grsm.com cxsmith@grsm.com;rvillaronga@grsm.com;ncleveland@grsm.com
Anthony F. Giuliano	on behalf of Defendant App Group International LLC afg@glpcny.com
Benjamin E.F.B. Waller	on behalf of Trustee Thomas W. Waldrep Jr. bwaller@hendrenmalone.com, jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com
Benjamin E.F.B. Waller	on behalf of Plaintiff Thomas W. Waldrep Jr. bwaller@hendrenmalone.com, jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com

District/off: 0417-5

User: admin

Page 2 of 8

Date Rcvd: May 17, 2023

Form ID: pdf014

Total Noticed: 0

Brian Behr

on behalf of Bankruptcy Administrator Bankruptcy Administrator brian\_behr@nceba.uscourts.gov  
rick\_hinson@nceba.uscourts.gov;lesley\_dean@nceba.uscourts.gov;tanya\_aycock@nceba.uscourts.gov;karen\_cook@nceba.uscourts.gov

Brian H. Smith

on behalf of Creditor Complete Business Solutions Group Inc. BRIAN.H.SMITH@FNF.COM

Brian R. Anderson

on behalf of Special Counsel Greenberg Traurig P.A. BRAnderson@foxrothschild.com, pwilliams@foxrothschild.com

Brian R. Anderson

on behalf of Health Care Ombudsman Suzanne Koenig BRAnderson@foxrothschild.com pwilliams@foxrothschild.com

Brian R. Anderson

on behalf of Special Counsel Greenberg Trauig LLP BRAnderson@foxrothschild.com, pwilliams@foxrothschild.com

Brian R. Anderson

on behalf of Other Professional SAK Management Services LLC BRAnderson@foxrothschild.com,  
pwilliams@foxrothschild.com

Byron L. Saintsing

on behalf of Defendant Funderz.net LLC d/b/a WG Capital bsaintsing@smithdebnamlaw.com

Byron L. Saintsing

on behalf of Creditor Siemens Financial Services Inc. bsaintsing@smithdebnamlaw.com

Catharine Edwards

on behalf of Defendant LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group cee@eblaw.com

Catharine Edwards

on behalf of Creditor Lindell Gardner cee@eblaw.com

Catharine Edwards

on behalf of Defendant Dennis Loudermilk cee@eblaw.com

Catharine Edwards

on behalf of Creditor Monroe Guest cee@eblaw.com

Catharine Edwards

on behalf of Defendant Monroe Guest cee@eblaw.com

Catharine Edwards

on behalf of Defendant Lindell Gardner cee@eblaw.com

Catharine Edwards

on behalf of Creditor LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group cee@eblaw.com

Catharine Edwards

on behalf of Creditor Dennis Loudermilk cee@eblaw.com

Charles N. Anderson, Jr.

on behalf of Interested Party Blue Cross Blue Shield of Oklahoma chuck.anderson@elliswinters.com  
patricia.hutchins@elliswinters.com;teri.rodriguez@elliswinters.com

Christopher J. Waivers

on behalf of Creditor Hospital Equipment Rental Company cwaivers@whiteandallen.com abarron@whiteandallen.com

Christopher Scott Kirk

on behalf of Creditor Megan Place scott@csklawoffice.com KirkSR83410@notify.bestcase.com

Dan Nelson

on behalf of Creditor Premier Specialty Network LLC dan.nelson@kutakrock.com

David J Haidt

on behalf of Interested Party Fairfax Healthcare Authority david@ayershaidt.com joy@ayershaidt.com

David J Haidt

on behalf of Other Professional C. David Rhoades david@ayershaidt.com joy@ayershaidt.com

David J Haidt

on behalf of Creditor First Liberty Bank david@ayershaidt.com joy@ayershaidt.com

David J Haidt

on behalf of Interested Party Brent King david@ayershaidt.com joy@ayershaidt.com

David J Haidt

on behalf of Interested Party City of Drumright Oklahoma david@ayershaidt.com, joy@ayershaidt.com

David J Haidt

on behalf of Creditor Fairfax Healthcare Authority david@ayershaidt.com joy@ayershaidt.com

David J Haidt

District/off: 0417-5  
Date Rcvd: May 17, 2023

User: admin  
Form ID: pdf014

Page 3 of 8  
Total Noticed: 0

	on behalf of Interested Party Cohesive Healthcare Management and Consulting david@ayershaidt.com joy@ayershaidt.com
David J Haidt	on behalf of Other Professional Brent King david@ayershaidt.com joy@ayershaidt.com
Dennis M. Duffy	on behalf of Creditor Internal Revenue Service usance.bankruptcy@usdoj.gov
E. Franklin Childress	on behalf of Creditor CAH Acquisition Company 11 LLC fchildress@bakerdonelson.com
Eric Winston	on behalf of Interested Party Rural Wellness Fairfax Inc. ericwinston@quinnemanuel.com
Eric J. Langston	on behalf of Defendant Michael Reece elangston@aegislaw.com ericlangston357.gmail.com@recap.email
Eric J. Langston	on behalf of Defendant Rural Lab Outreach LLC elangston@aegislaw.com, ericlangston357.gmail.com@recap.email
Eric J. Langston	on behalf of Defendant Reboot Inc. d/b/a HIPAA GUARD elangston@aegislaw.com, ericlangston357.gmail.com@recap.email
Eric L. Johnson	on behalf of Creditor First Capital Corporation ejohnson@spencerfane.com
Erin K. Duffy	on behalf of Interested Party Boa Vida Foundation Inc. erin@janvierlaw.com, erin@janvierlaw.com;june@janvierlaw.com;samantha@janvierlaw.com
Erin K. Duffy	on behalf of Creditor Haskell Regional Hospital Inc. erin@janvierlaw.com, erin@janvierlaw.com;june@janvierlaw.com;samantha@janvierlaw.com
Erin K. Duffy	on behalf of Creditor Oswego Neuropsych Hospital Inc. erin@janvierlaw.com, erin@janvierlaw.com;june@janvierlaw.com;samantha@janvierlaw.com
Erin K. Duffy	on behalf of Interested Party Boa Vida Foundation erin@janvierlaw.com erin@janvierlaw.com;june@janvierlaw.com;samantha@janvierlaw.com
Ethridge B. Ricks	on behalf of Interested Party Aetna Life Insurance Company bricks@mcguirewoods.com
Ethridge B. Ricks	on behalf of Creditor Aetna Inc. bricks@mcguirewoods.com
Ethridge B. Ricks	on behalf of Interested Party Aetna Health Inc. bricks@mcguirewoods.com
Ethridge B. Ricks	on behalf of Interested Party Rural Wellness Fairfax Inc. bricks@mcguirewoods.com
Evan A. Lee	on behalf of Trustee Thomas W. Waldrep Jr. 3111956420@filings.docketbird.com
Evan A. Lee	on behalf of Plaintiff Thomas W. Waldrep Jr. 3111956420@filings.docketbird.com
Felton E. Parrish	on behalf of Interested Party Bank of Hays felton.parrish@alexanderricks.com
Felton E. Parrish	on behalf of Interested Party City of Hillboro Kansas and the Public Building Commission of Hillsboro, Kansas felton.parrish@alexanderricks.com
Felton E. Parrish	on behalf of Interested Party Security Bank of Kansas City felton.parrish@alexanderricks.com
Felton E. Parrish	on behalf of Other Professional Brent King felton.parrish@alexanderricks.com
Francisco T. Morales	on behalf of Trustee Thomas W. Waldrep Jr. notice@waldrepllp.com, 8899@notices.nextchapterbk.com
George M. Oliver	on behalf of Other Professional Sherwood Partners Inc. efile@ofc-law.com, george@olivercheek.com;pam@olivercheek.com;katymac@olivercheek.com;clayton@olivercheek.com;linda@olivercheek.com; ben@olivercheek.com;dawn@olivercheek.com;christa@olivercheek.com;austin@olivercheek.com
James Albert Barnes, IV	on behalf of Defendant Monroe Guest jim@oxendinebarnes.com

District/off: 0417-5  
Date Rcvd: May 17, 2023

User: admin  
Form ID: pdf014

Page 4 of 8  
Total Noticed: 0

James Albert Barnes, IV	on behalf of Defendant Lindell Gardner jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Creditor Monroe Guest jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Defendant LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Creditor Lindell Gardner jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Creditor Dennis Loudermilk jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Defendant Dennis Loudermilk jim@oxendinebarnes.com
James Albert Barnes, IV	on behalf of Creditor LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group jim@oxendinebarnes.com
James C. Lanik	on behalf of Plaintiff Thomas W. Waldrep Jr. notice@waldrepwall.com, trustee@waldrepllp.com;7357193420@filings.docketbird.com
James C. Lanik	on behalf of Trustee Thomas W. Waldrep Jr. notice@waldrepwall.com, trustee@waldrepllp.com;7357193420@filings.docketbird.com
James C. Lanik	on behalf of Plaintiff Thomas W. Waldrep Jr. Trustee notice@waldrepwall.com, trustee@waldrepllp.com;7357193420@filings.docketbird.com
James C. Lanik	on behalf of Plaintiff Thomas W. Waldrep Jr., Trustee notice@waldrepwall.com, trustee@waldrepllp.com;7357193420@filings.docketbird.com
James S. Livermon, III	on behalf of Defendant Michael Reece Charlie.livermon@wbd-us.com kim.cone@wbd-us.com
James S. Livermon, III	on behalf of Defendant Reboot Inc. d/b/a HIPAA GUARD Charlie.livermon@wbd-us.com, kim.cone@wbd-us.com
James S. Livermon, III	on behalf of Defendant Rural Lab Outreach LLC Charlie.livermon@wbd-us.com, kim.cone@wbd-us.com
Jason L. Hendren	on behalf of Trustee Thomas W. Waldrep Jr. jhendren@hendrenmalone.com, jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com
Jason L. Hendren	on behalf of Plaintiff Thomas W. Waldrep Jr. jhendren@hendrenmalone.com, jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com
Jeffrey C Wisler	on behalf of Creditor Cigna HealthCare of North Carolina Inc. jwisler@connollygallagher.com
Jeffrey C Wisler	on behalf of Creditor Cigna Health and Life Insurance Company jwisler@connollygallagher.com
Jeffrey R. Whitley	on behalf of Creditor First Capital Corporation jwhitley@foxrothschild.com cindy.mann@smithmoorelaw.com
Jennifer B. Lyday	on behalf of Financial Advisor Grant Thornton LLP notice@waldrepwall.com, 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Special Counsel Flanagan & Associates LLC notice@waldrepwall.com, 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Special Counsel Parker Hudson Rainer & Dobbs LLP notice@waldrepwall.com, 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Accountant Arnett Carbis Toothman LLP notice@waldrepwall.com 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Plaintiff Thomas W. Waldrep Jr. notice@waldrepwall.com, 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Accountant Arnett Carbis Toothman LLP and its successor Baker Tilly US, LLP notice@waldrepwall.com, 8836221420@filings.docketbird.com

District/off: 0417-5

User: admin

Page 5 of 8

Date Rcvd: May 17, 2023

Form ID: pdf014

Total Noticed: 0

Jennifer B. Lyday	on behalf of Special Counsel McDonald Hopkins LLC notice@waldrepwall.com, 8836221420@filings.docketbird.com
Jennifer B. Lyday	on behalf of Trustee Thomas W. Waldrep Jr. notice@waldrepwall.com, 8836221420@filings.docketbird.com
John A. Northen	on behalf of Defendant Rural Community Hospitals of America LLC jan@nbfirm.com, nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Creditor Estate of Paul Nusbaum jan@nbfirm.com nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Defendant Michael Nusbaum as the successor Administrator of the Nusbaum Estate jan@nbfirm.com nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Interested Party Rural Community Hospitals of America LLC jan@nbfirm.com, nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Defendant Steve White jan@nbfirm.com nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Creditor Steven F. White jan@nbfirm.com nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Interested Party Estate of Paul Nusbaum jan@nbfirm.com nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John A. Northen	on behalf of Creditor Sun Finance Inc. jan@nbfirm.com, nc30@ecfbis.com;jla@nbfirm.com;sks@nbfirm.com
John G. Rhyne	on behalf of Creditor Slack & Company LLC johnrhyne@johnrhynelaw.com beth@johnrhynelaw.com
John M. Sperati	on behalf of Creditor Somerset Capital Group Ltd. jsperati@smithdebnamlaw.com, dkinlaw@smithdebnamlaw.com;cmcghee@smithdebnamlaw.com
John M. Sperati	on behalf of Creditor Somerset Leasing Corp XXII jsperati@smithdebnamlaw.com, dkinlaw@smithdebnamlaw.com;cmcghee@smithdebnamlaw.com
John Paul Hughes Cournoyer	on behalf of Creditor Paul L. Nusbaum jpc@nbfirm.com jla@nbfirm.com;sks@nbfirm.com
John Paul Hughes Cournoyer	on behalf of Creditor Sun Finance Inc. jpc@nbfirm.com, jla@nbfirm.com;sks@nbfirm.com
John Paul Hughes Cournoyer	on behalf of Creditor Steven F. White jpc@nbfirm.com jla@nbfirm.com;sks@nbfirm.com
John Paul Hughes Cournoyer	on behalf of Interested Party Rural Community Hospitals of America LLC jpc@nbfirm.com, jla@nbfirm.com;sks@nbfirm.com
John R. Van Swearingen	on behalf of Trustee Thomas W. Waldrep Jr. 1107444420@filings.docketbird.com
John R. Van Swearingen	on behalf of Plaintiff Thomas W. Waldrep Jr. 1107444420@filings.docketbird.com
John R. Van Swearingen	on behalf of Plaintiff Thomas W. Waldrep Jr. Trustee 1107444420@filings.docketbird.com
Jonathan E. Friesen	on behalf of Creditor Wendy C. Phillips jef@gillespieandmurphy.com cjones@lawyersforchrist.com;mholand@lawyersforchrist.com
Joseph Samuel Dowdy	on behalf of Creditor Blue Cross Blue Shield of North Carolina jdowdy@kilpatricktownsend.com
Katherine Montgomery McCraw	on behalf of Creditor NC Dept of Health and Human Services DHB kmccraw@ncdoj.gov, ekaczynski@ncdoj.gov;rstipe@ncdoj.gov;kchadwick@ncdoj.gov
Kelly Alfred Cameron	on behalf of Plaintiff Thomas W. Waldrep Jr. Trustee kcameron@waldrepwall.com
Kirstin E. Gardner	on behalf of Bankruptcy Administrator Bankruptcy Administrator kirstin_gardner@nceba.uscourts.gov Tanya_aycock@nceba.uscourts.gov

District/off: 0417-5  
Date Rcvd: May 17, 2023

User: admin  
Form ID: pdf014

Page 6 of 8  
Total Noticed: 0

Lauren A. Golden	on behalf of Creditor Department of Health and Human Services lauren.golden@usdoj.gov kristen.caldaro@usdoj.gov
Marjorie K. Lynch	on behalf of Bankruptcy Administrator Bankruptcy Administrator mklynchjd@gmail.com lynn_tingen@nceba.uscourts.gov;karen_hayes@nceba.uscourts.gov;lesley_cavenaugh@nceba.uscourts.gov;Tanya_aycock@nceba.uscourts.gov
Mark A. Pinkston	on behalf of Creditor ERx LLC dnave@vwlawfirm.com, mpennington@vwlawfirm.com
Mathew A. Petersen	on behalf of Creditor First Capital Corporation mpetersen@spencerfane.com
Melanie Johnson Raubach	on behalf of Interested Party Atchison Hospital Association mraubach@lawhssm.com vhughes@lawhssm.com;rkelley@lawhssm.com;mwiner@lawhssm.com
Michael J. Quinn	on behalf of Creditor Department of Health and Human Services michael.quinn3@usdoj.gov
Nancy A. Peterman	on behalf of Health Care Ombudsman Suzanne Koenig petermann@gtlaw.com
Neal Fowler	on behalf of Creditor Centers for Medicare and Medicaid Services neal.fowler@usdoj.gov usance.bankruptcy@usdoj.gov
Neal Fowler	on behalf of Interested Party Centers for Medicare and Medicaid Services neal.fowler@usdoj.gov usance.bankruptcy@usdoj.gov
Nicholas Zluticky	on behalf of Creditor First Liberty Bank nick.zluticky@stinson.com
Nicholas Zluticky	on behalf of Interested Party Bank of Hays nick.zluticky@stinson.com
Pamela P. Keenan	on behalf of Creditor Hitachi Capital America Corp. pkeenan@kirschlaw.com
Patricia E. Hamilton	on behalf of Other Professional Brent King phamilton@stevensbrand.com
Paul A. Fanning	on behalf of Creditor Cohesive Healthcare Management and Consulting LLC paf@wardandsmith.com, DocketCR@wardandsmith.com;blspang@wardandsmith.com;nsf@wardandsmith.com
Paul A. Fanning	on behalf of Interested Party Cohesive Healthcare Management and Consulting LLC paf@wardandsmith.com, DocketCR@wardandsmith.com;blspang@wardandsmith.com;nsf@wardandsmith.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 12 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 1 LLC d/b/a Washington County Hospital tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 6 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 16 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 3 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 7 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 2 LLC tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rayford K. Adams, III	on behalf of Debtor CAH Acquisition Company 4 Inc. tadams@spilmanlaw.com, cpeterson@spilmanlaw.com
Rebecca Lindahl	on behalf of Creditor Affinity Health Partners LLC rebecca.lindahl@kattenlaw.com, courtalertclt@katten.com
Rebecca Lindahl	on behalf of Other Professional Affinity Health Partners LLC rebecca.lindahl@kattenlaw.com, courtalertclt@katten.com
Rebecca F. Redwine	on behalf of Trustee Thomas W. Waldrep Jr. rredwine@hendrenmalone.com,

District/off: 0417-5  
Date Rcvd: May 17, 2023

User: admin  
Form ID: pdf014

Page 7 of 8  
Total Noticed: 0

jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com

Rebecca F. Redwine

on behalf of Plaintiff Thomas W. Waldrep Jr. rredwine@hendrenmalone.com,  
jgorman@hendrenmalone.com;ygadalla@hendrenmalone.com

Ross A. Plourde

on behalf of Creditor Cohesive Healthcare Management and Consulting LLC ross.plourde@mcafeetaft.com

Ross A. Plourde

on behalf of Creditor Total Medical Personnel Staffing ross.plourde@mcafeetaft.com

Ross A. Plourde

on behalf of Interested Party Cohesive Healthcare Management and Consulting LLC ross.plourde@mcafeetaft.com

Ryan Delaney Oxendine

on behalf of Defendant Dennis Loudermilk ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Creditor LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Defendant LGMG LLC d/b/a Verifi Labs and d/b/a Verifi Resource Group ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Creditor Dennis Loudermilk ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Defendant Monroe Guest ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Defendant Lindell Gardner ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Creditor Monroe Guest ryan@oxendinepricelaw.com

Ryan Delaney Oxendine

on behalf of Creditor Lindell Gardner ryan@oxendinepricelaw.com

Sam G. Bratton, II

on behalf of Debtor CAH Acquisition Company 12 LLC sbratton@dsda.com

Sam G. Bratton, II

on behalf of Interested Party Doerner Saunders, Daniel & Anderson, LLP sbratton@dsda.com

Sharon L. Stolte

on behalf of Other Professional Brent King sstolte@sandbergphoenix.com

Sharon L. Stolte

on behalf of Interested Party Brent King sstolte@sandbergphoenix.com

Stephen W. Petersen

on behalf of Creditor First Capital Corporation spetersen@foxrothschild.com cindy.mann@smithmoorelaw.com

Steven A. Ginther

on behalf of Creditor Missouri Department of Revenue ednc@dor.mo.gov

Thomas W. Waldrep, Jr.

on behalf of Financial Advisor Grant Thornton LLP notice@waldrepwall.com,  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Accountant Arnett Carbis Toothman LLP notice@waldrepwall.com  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Plaintiff Thomas W. Waldrep Jr. Trustee notice@waldrepwall.com,  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Special Counsel Parker Hudson Rainer & Dobbs LLP notice@waldrepwall.com,  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Plaintiff Thomas W. Waldrep Jr. notice@waldrepwall.com,  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Trustee Thomas W. Waldrep Jr. notice@waldrepwall.com,  
2942809420@filings.docketbird.com;NC71@ecfbis.com

Thomas W. Waldrep, Jr.

on behalf of Plaintiff Thomas W. Waldrep Jr., Trustee notice@waldrepwall.com,

District/off: 0417-5

User: admin

Page 8 of 8

Date Rcvd: May 17, 2023

Form ID: pdf014

Total Noticed: 0

2942809420@filings.docketbird.com;NC71@ecfcbis.com

Travis Sasser

on behalf of Creditor Saline County Collector travis@sasserbankruptcy.com  
sasserlaw230@gmail.com;SasserTR70250@notify.bestcase.com;SasserLawFirm@jubileebk.net

Tyler E. Heffron

on behalf of Interested Party City of Hillboro Kansas and the Public Building Commission of Hillsboro, Kansas  
theffron@twgfirm.com

Vicki L. Parrott

on behalf of Creditor Sun Finance Inc. vlp@nbfirm.com, jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Interested Party Estate of Paul Nusbaum vlp@nbfirm.com jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Creditor Steven F. White vlp@nbfirm.com jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Interested Party Rural Community Hospitals of America LLC vlp@nbfirm.com, jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Creditor Estate of Paul Nusbaum vlp@nbfirm.com jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Defendant Rural Community Hospitals of America LLC vlp@nbfirm.com, jla@nbfirm.com;sks@nbfirm.com

Vicki L. Parrott

on behalf of Defendant Steve White vlp@nbfirm.com jla@nbfirm.com;sks@nbfirm.com

Wesley F. Smith

on behalf of Other Professional Brent King wsmith@stevensbrand.com

William C. Smith, Jr.

on behalf of Interested Party Transcendental Union with Love and Spirit smith@manningfulton.com  
steinman@manningfulton.com

William C. Smith, Jr.

on behalf of Assignee Transcendental Union and Love Spiritual Advancement smith@manningfulton.com  
steinman@manningfulton.com

William P Janvier

on behalf of Interested Party Boa Vida Foundation Inc wjanvier@smvt.com,  
laura@janvierlaw.com;june@janvierlaw.com;kelly@janvierlaw.com;kelly@janvierlaw.com;R55537@notify.bestcase.com;darlene@janvierlaw.com;lpetruska@smvt.com

William P Janvier

on behalf of Interested Party Boa Vida Foundation wjanvier@smvt.com  
laura@janvierlaw.com;june@janvierlaw.com;kelly@janvierlaw.com;kelly@janvierlaw.com;R55537@notify.bestcase.com;darlene@janvierlaw.com;lpetruska@smvt.com

William P Janvier

on behalf of Interested Party Boa Vida Foundation Inc. wjanvier@smvt.com,  
laura@janvierlaw.com;june@janvierlaw.com;kelly@janvierlaw.com;kelly@janvierlaw.com;R55537@notify.bestcase.com;darlene@janvierlaw.com;lpetruska@smvt.com

William Walt Pettit

on behalf of Creditor Ryan Stumphauzer as Receiver for Complete Business Solutions Group Inc.  
walt.pettit@hutchenslawfirm.com, renee.copley@hutchenslawfirm.com

William Walt Pettit


on behalf of Creditor Complete Business Solutions Group Inc. walt.pettit@hutchenslawfirm.com,  
renee.copley@hutchenslawfirm.com

TOTAL: 174



SO ORDERED.

SIGNED this 17 day of May, 2023.

  
Joseph N. Callaway  
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION

IN RE:	)	
	)	
CAH ACQUISITION COMPANY #1, LLC	)	CASE NO. 19-00730-5-JNC
d/b/a WASHINGTON COUNTY	)	
HOSPITAL,	)	CHAPTER 11
Debtor.	)	

**ORDER GRANTING EX PARTE MOTION FOR PRODUCTION OF DOCUMENTS  
AND EXAMINATION PURSUANT TO BANKRUPTCY RULE 2004**

THIS MATTER came before the Court upon the Ex Parte Motion for Production of Documents and Examination Pursuant to Bankruptcy Rule 2004 (the "Motion") filed by Thomas W. Waldrep, Jr., Trustee<sup>1</sup> in the above-captioned case. Based upon the Motion, consideration of the record before the Court, and for good cause otherwise shown, this Court is of the opinion that the Motion should be GRANTED.

It is hereby ORDERED, ADJUDGED, and DECREED as follows:

1. U.S. Bank National Association shall produce the documents, as described in Exhibit A attached hereto, for inspection and copying on or before June 8, 2023, at such place as the Trustee and U.S. Bank National Association may mutually agree.

**END OF DOCUMENT**

<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

## **EXHIBIT A**

### **TRUSTEE'S REQUEST FOR PRODUCTION OF DOCUMENTS BY US BANK<sup>2</sup>**

#### **DEFINITIONS**

1. The term “accounts” means all checking, saving, money market, investment or other deposit account (as that term is defined by Section 4-104(a)(1) of the Uniform Commercial Code).

2. The terms “and” as well as “or” shall be construed conjunctively or disjunctively, and the singular shall be deemed to include the plural and vice-versa, as necessary to bring within the scope of this request all documents and information that might otherwise be construed to be outside its scope.

3. The terms “all” and “any” shall include any and all.

4. The term “Applicable Period” means the period from January 1, 2015 through the present.

5. “Bankruptcy Cases” shall mean the voluntary chapter 11 or chapter 7 bankruptcy cases of CAH 1 (Case No. 19-00730) and its affiliates, currently pending in the Bankruptcy Court.

6. “Bankruptcy Court” shall mean the United States Bankruptcy Court for the Eastern District of North Carolina.

7. “CAH 1” means CAH Acquisition Company #1 LLC, d/b/a Washington County Hospital, or any variation thereof.

---

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Ex Parte Motion for Production of Documents and Examination Pursuant to Bankruptcy Rule 2004.

8. The terms “communicate,” “communicating,” “communication” or “communications” means the transmittal of information, whether written or oral, in the form of facts, ideas, inquiries or otherwise, as well as any oral or written utterance, notation, statement or transmittal of any information of any nature whatsoever, by and to whomsoever made, including, without limitation, electronic mail, facsimile, correspondence, meetings, conversations, dialogues, discussions, interviews, consultations, agreements, and other understanding between or among two or more persons.

9. The term “concerning” shall mean related to, referring to, with respect to, pertaining to, concerning, in connection with, describing, mentioning, evidencing, or constituting.

10. The term “document” means any written, recorded or graphic materials of any kind, form or shape whether prepared by you or other persons, that are in your possession, custody or control including, but not limited to, documents in the physical possession of your accountants, attorneys, or others but which you have the legal or practical right to obtain). This definition includes the front and back of a tangible writing if information appears on both (e.g., cancelled check) and includes drafts and copies which vary in any way from originals as well as all information stored in machine readable form or accessible through computer or other information retrieval systems, including electronic mail, together with instructions and all other materials necessary to access, use or interpret such information. As such, a document includes, but is not limited to, the original and all copies, regardless of origin or location, of any paper, letter, memorandum, facsimile, telegram, telex, cable, other correspondence, report, record, study, note, diary, calendar, working paper, chart, book, graph, index, tape, data sheet or data processing card, floppy disk, printed circuit, canceled check, other bank record, ledger, bill,

invoice, computation, schedule, contract, lease, analysis, appraisal, summary, instruction, computer memory bank, including supporting, underlying, or preparatory material, however produced or reproduced, to which you have or have had access to which may be in your possession, custody or control.

11. The term “financial record” means, with respect to a person, any document which pertains in any way to the financial condition, business, or business operations of that person, including, without limitation, the cash flows, profit-making operations, revenues, or overall financial condition of such person. For the avoidance of doubt, Financial Records shall include, but not be limited to, any income statements, balance sheets, cash-flow statements, profit-and-loss statements, audit reports, account statements, tax returns, and reports on or reflecting any of the Debtors’ business operations, whether in draft or final form.

12. The term “person” shall mean (without limitation) any natural person, firm, sole proprietorship, partnership, corporation, association, trust, governmental body, or agency.

13. The term “representative” shall mean, with respect to a person, any past or present officer, director, employee, agent, attorney, financial advisor, investment banker or accountant of that person, including (without limitation) a representative acting or purporting to act on such person’s behalf or at the request or instruction of such person.

14. The terms “Respondent” or “you” mean you and any agents, representatives, attorneys, or other person responding to these requests on your behalf..

15. The term “referring to or relating to” means containing, constituting, evidencing, showing or relating or referring to in any way, directly or indirectly, and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each request.

16. The terms “possession,” “custody” and “control,” as used with respect to a document or other requested material, shall include, in addition to all documents in the actual possession of Respondent, or its attorneys or agents, any materials, the location or proprietor of which is known to Respondent, its attorneys or agents.

17. Except as otherwise specified herein, terms which are not defined in these Requests shall have the definitions given to those terms by the Bankruptcy Code, Federal Rules of Bankruptcy Procedure (including the Federal Rules of Civil Procedure to the extent they are made applicable by the Bankruptcy Rules), and/or any applicable Local Rules.

### **INSTRUCTIONS FOR THE REQUESTS**

1. In responding to the requests, furnish all documents available to you, including documents in the possession of your attorneys or anyone acting on your behalf.

2. You are not being asked to produce any documents subject to the attorney-client privilege or attorney work product doctrine. If you object to any request and/or any document responsive to any request is withheld based on any claim of privilege or protection from discovery of any kind, describe generally the document or information withheld and state the privilege upon which you rely in withholding such document or information.

3. You shall produce all documents in the manner in which they are maintained in the usual course of your business or you shall organize and label the documents to correspond with the categories in this request. A request for a document shall be deemed to include a request for any and all file folders within which the document was contained, transmittal sheets, cover letters, exhibits, enclosures, or attachments to the document in addition to the document itself.

4. If and to the extent documents are maintained in a database or other electronic format, you shall produce along with the document(s) software that will enable access to the

electronic document(s) or database as you would access such electronic document(s) or database in the ordinary course of your business.

5. Documents attached to each other should not be separated.
6. The fact that a document is produced by another party does not relieve you of the obligation to produce your copy of the same document, even if the two documents are identical.
7. In the event that you claim that a request is unduly burdensome, you shall respond to that portion of the request that is unobjectionable and specifically identify the respect in which the request is unduly burdensome.
8. In the event that you claim that a request is overbroad, you shall respond to that portion of the request that is unobjectionable and specifically identify the respect in which the request is overbroad.
9. The past tense shall include the present tense and vice versa.
10. Singular nouns shall include plural forms and vice versa.
11. When a document request refers to a person or entity and seeks any communications to or from, or documents related to, said person or entity, the request includes documents or communications to and from (and documents related to) representatives, agents, counsel and any other party communicating on behalf of such person or entity.

### **REQUESTS**

1. Any and all SAR's reports for the following bank accounts by CAH 1 and its affiliates from January 1, 2015 through the Petition Date:

Bank Name	Account Name	Account Number
US Bank	Health Acquisition Company LLC Operating Account	145592868759
US Bank	HMC/CAH Consolidated Inc.	145592399904
US Bank	Health Acquisition Company Payroll Account	145592868742
US Bank	Empower HMS LLC Payroll	145592867256

US Bank	Empower HMS LLC Payroll	145592868726
---------	-------------------------	--------------